

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Numbering Policies for Modern Communications)	WC Docket No. 13-97
)	
IP-Enabled Services)	WC Docket No. 04-36
)	
Telephone Number Requirements for IP-Enabled Services Providers)	WC Docket No. 07-243
)	
Telephone Number Portability)	CC Docket No. 95-116
)	
Developing a Unified Intercarrier Compensation Regime)	CC Docket No. 01-92
)	
Connect America Fund)	WC Docket No. 10-90
)	
Numbering Resource Optimization)	CC Docket No. 99-200
)	
Petition of Vonage Holdings Corp. for Limited Waiver of Section 52.15(g)(2)(i) of the Commission's Rules Regarding Access to Numbering Resources)	
)	
Petition of TeleCommunication Systems, Inc. and HBF Group, Inc. for Waiver of Part 52 of the Commission's Rules)	
)	

REPLY COMMENTS OF COMCAST CORPORATION

Comcast Corporation and its affiliates (“Comcast”) hereby submit this short reply to address two problematic proposals advanced by Verizon and Verizon Wireless (“Verizon”) and CenturyLink in their comments in response to the Notice of Proposed Rulemaking, Order, and Notice of Inquiry released by the Federal Communications Commission (“FCC” or

“Commission”) in the above-captioned proceeding.¹ Both proposals concern the recovery of costs associated with the administration of the local number portability (“LNP”) database.

Specifically, Verizon and CenturyLink urge the Commission to grant promptly the Petition for Declaratory Ruling that Verizon filed in 2011,² which seeks to change the manner in which the costs of completing certain types of number ports are recovered from carriers.³ Currently, the industry recovers the shared costs of administering ports from all carriers based on their relative share of interstate end user revenues. Under Verizon’s proposal, the costs of completing Type 1 ports – intra-service provider ports in which a single service provider is porting a number within its own network – and certain “modifies” of the Number Portability Administration Center database would “be excluded from shared costs” and paid for by each provider on a usage-sensitive basis.⁴

As Comcast and other parties explained in their 2011 comments, the Commission should deny Verizon’s petition for two basic reasons.⁵ First, grant of the requested relief would have

¹ *Numbering Policies for Modern Communications; IP-Enabled Services; Telephone Number Requirements for IP-Enabled Services Providers; Telephone Number Portability; Developing a Unified Intercarrier Compensation Regime; Connect America Fund; Numbering Resource Optimization; Petition of Vonage Holdings Corp. for Limited Waiver of Section 52.15(g)(2)(i) of the Commission’s Rules Regarding Access to Numbering Resources; Petition of TeleCommunication Systems, Inc. and HBF Group, Inc. for Waiver of Part 52 of the Commission’s Rules*, Notice of Proposed Rulemaking, Order, and Notice of Inquiry, 28 FCC Rcd 5842 (2013) (“Notice” or “NPRM & NOI”).

² Comments of Verizon and Verizon Wireless, WC Docket No. 13-97, at 6 (July 19, 2013) (“Verizon Comments”); Comments of CenturyLink, WC Docket No. 13-97, at 21 (July 19, 2013) (“CenturyLink Comments”).

³ Petition of Verizon and Verizon Wireless for Declaratory Ruling to Assess NPAC Database Intra-Provider Transaction Costs on the Requesting Provider, WC Docket No. 11-95 (May 20, 2011, filed May 31, 2011).

⁴ *Id.* at 8-9.

⁵ Comments of Comcast Corporation, WC Docket No. 11-95 (July 15, 2011) (“2011 Comcast Comments”); Reply Comments of Comcast Corporation, WC Docket No. 11-95 (Aug. 15, 2011); Comments of COMPTTEL, WC Docket No. 11-95 (July 15, 2011, filed July 14,

significant discriminatory and anti-competitive effects, because it would shift a disproportionate share of the LNP administrative costs to Verizon's competitive local exchange carrier ("LEC") rivals.⁶ Second, and more basically, changes in the manner in which LNP costs are recovered may only be made through a notice and comment rulemaking proceeding, not via a declaratory ruling petition.⁷ The Commission, thus, should reject the renewed requests in this proceeding.

The Commission also should deny the suggestion made by Verizon and CenturyLink that this proceeding should be used to overhaul the existing system for recovering LNP administrative costs.⁸ The Commission should not attempt to review and revise the existing LNP cost recovery scheme in a proceeding that is primarily focused on the impact of the transition to Internet Protocol ("IP") voice on FCC numbering policies unrelated to cost recovery. A proceeding to address the rules governing the recovery of LNP costs is likely to involve complex issues that go well beyond the transition to an all-IP world for voice, and must be considered in that broader context. Hence, to the extent the Commission wishes to commence such a review of the cost recovery rules, it should initiate a separate rulemaking proceeding.

2011); Comments of XO Communications, LLC, WC Docket No. 11-95 (July 15, 2011); Reply Comments of tw telecom inc., WC Docket No. 11-95 (Aug. 15, 2011).

⁶ As Comcast has explained, unlike competitive LECs, incumbent LECs would not be subject to per-transaction fees for Type 1 ports for the vast majority of their intra-service provider ports, because they are able to use the Local Exchange Routing Guide ("LERG") to accomplish comparable changes. In 2011, less than 15 percent of Comcast's central office codes could be routed via the LERG, whereas almost 98 percent of Verizon's central office codes could be routed in this manner. 2011 Comcast Comments at 7-8. Today, the disparity is even more pronounced. July 2013 information derived from LERG6 indicates that less than 10 percent of Comcast's central office codes can be routed via the LERG, while Verizon remains able to route 98 percent of its central office codes using the LERG.

⁷ 2011 Comcast Comments at 12-13.

⁸ Verizon Comments at 4-7; CenturyLink Comments at 20-23.

CONCLUSION

For the foregoing reasons, the Commission should reject the proposals put forward by Verizon and CenturyLink regarding the recovery of LNP administrative costs.

Respectfully submitted,

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